



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

September 25, 2023

BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*,
No. 23 Civ. 1529 (VEC)

Dear Judge Caproni:

This Office represents defendant the United States Department of State (“State Department”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”). I respectfully request a *nunc pro tunc* one-business day extension of the deadline to answer the complaint, from September 22 to today.

On August 18, 2023, the Court adopted the parties’ proposed schedule for answering the complaint and summary judgment briefing, which included September 22 as the deadline for defendant to answer the complaint. ECF No. 18. Defendant’s answer was not filed on Friday because the deadline had not been calendared properly. I apologize for any inconvenience to the Court or plaintiff. Plaintiffs consent to the requested extension. Thank you for Your Honor’s consideration.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendant

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cc: *Plaintiffs’ counsel* (by ECF)